



Wheels Up Wealth, Inc.
Form ADV Part 3: Customer Relationship Summary
February 9, 2026

Introduction

Wheels Up Wealth, Inc. is an investment adviser registered with the US Securities and Exchange Commission (SEC), offering advisory accounts and services. Our investment advisory services and fees can differ from those of a broker-dealer, and you need to understand those differences. This document gives you a summary of the types of services we provide and how you pay. Please ask us for more information. We encourage you to visit [Investor.gov/CRS](https://www.investor.gov/CRS) which is a free and simple search tool to research our firm and our financial professionals.

What Investment Services and Advice can you provide me?

There are different ways you can get help with your investments. You should carefully consider which type of account and the services that are right for you. Wheels Up Wealth, Inc. usually meets with clients directly but may also work with clients by phone or through internet communication, to provide investment advice, develop strategies and define goals. Investment Management Services are provided on a discretionary basis. Discretionary authority allows Wheels Up Wealth, Inc. to buy and sell securities without asking in advance whereas non-discretionary authority is limited to offering advice, but you make the decision to buy or sell. Wheels Up Wealth, Inc. receives compensation by charging ongoing fees for combined comprehensive financial planning and investment management services, which are based on the value of cash and other investments in your advisory accounts. We also may charge project-based financial planning fees. We do not have a minimum account size required to open an account.

Conversation Starter. Ask your financial professional—

- Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of service? Why or why not?
- How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

What fees will I pay?

Please ask your financial professional to give you personalized information on the fees you will pay. The amount paid to our firm and your financial professional generally does not vary based on the type of investment we select on your behalf. Wheels Up Wealth, Inc. strives to use the most cost-effective investment choices but in some instances a transaction fee, known as a ticket charge, will apply (these ticket charges are charged by the custodian, and we do not share in that revenue). Ongoing Financial Planning and Investment Management fees are negotiable and are prorated and paid in arrears on a quarterly basis, based upon the average daily value of the account over the previous quarter as valued by the Custodian. The more assets you have in an advisory account, including cash, the more you will pay us. We therefore have an incentive to increase the assets in your account to increase your fees. You pay our advisory fee even if you do not buy or sell during the fee period. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Project-based fees are based on an estimate to be provided based on the complexity of your needs.

Conversation Starter. Ask your financial professional—

- Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when providing recommendations as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

We must abide by certain laws and regulations in our interactions with you. We are held to a fiduciary standard that covers our entire investment advisory relationship with you. For example, we are required to monitor your portfolio, investment strategy and objectives on an ongoing basis. Our Financial Professionals only offer investment advisory services through Wheels Up Wealth, Inc. Investment advisory services require that we act as a fiduciary and put your interest above ours.

When acting in the capacity of an investment adviser, your Financial Professional mitigates conflicts of interest by only acting in your best interest. To the extent requested by a client, Wheels Up Wealth, Inc. may recommend the services of other professionals for certain non-investment implementation purposes (i.e., attorneys, accountants, insurance, etc.). The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from Wheels Up Wealth, Inc., and we do not share in any portion of the revenue derived from such recommendations.

Conversation Starter. Ask your financial professional—

- How might your conflicts of interest affect me, and how will you address them? How do your financial professionals make money?

Our interests can conflict with your interests. We must eliminate these conflicts or tell you about them in a way you can understand, so that you can decide whether to agree to them. Your Financial Professional makes money based on the amount of assets they manage for you, and fees from financial planning services. Cash compensation is the sole form of compensation. Your Financial Professional does not receive any form of non-cash compensation.

Do you or your financial professionals have legal or disciplinary history?

No, Wheels Up Wealth, Inc. does not have any disciplinary history to disclose. To report a problem to the SEC, visit [Investment Adviser Public Disclosure \(IAPD\)](#) or call the SEC's toll-free investor assistance line at (800)732-0330.

Conversation Starter. Ask your financial professional—

- As a financial professional, do you have any disciplinary history? For what type of conduct?
- Who is my primary contact person? Is he or she a representative of an investment advisor or a broker-dealer?
- Who can I talk to if I have concerns about how this person is treating me?

Additional Information

We encourage you to visit Investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals. If you have a problem with your investment, investment accounts or a financial professional, contact us in writing at 290 E L Street #66, Benicia, CA 94510. For additional information on our advisory services, see our ADV brochure available at [Investment Adviser Public Disclosure \(IAPD\)](#). A copy of our ADV brochure can also be obtained at no cost or by calling us at (707) 400-0992.